



200 Nieto Avenue, Suite 207
Long Beach, CA 90803
(805) 895 - 3000 or
(714) 686 - 6548

July 12, 2010

Lester A. Snow
Secretary for Natural Resources
c/o Lawrence Matthews
1330 Broadway, 13th Floor
Oakland, CA 94612

RE: Oil Platform Decommissioning Study Comments

Dear Secretary Snow:

The Sportfishing Conservancy represents conservation minded recreational fishermen. We attended the OPC meeting in Santa Barbara on June 25 and will address two issues raised at that meeting.

First, it was interesting to note that many public comments concerned the "lack of data" regarding decommissioning included in the OST report, particularly as the OST Report was very specific in stating that variances between each drilling platform would necessitate an independent investigation of the specifics related to the platform under consideration. In effect, the comments confirmed the study's conclusion.

Secondly, while the report itself has been peer reviewed and offers an unbiased look at the science behind platform decommissioning, the accompanying PLATFORM decision model has not. We suggest that the weights given to specific factors in the Multi Attribute Utility Analysis may prejudice the results. Specifically, the Strict Compliance factor, which is a contractual legal issue, outweighs all environmental considerations. While we believe in the sanctity of contracts, this issue should be considered in light of the best available science, not contracts drawn in the 1950's. There is precedent for updating environmental regulations in the face of better scientific information. This issue, as a policy decision, has no part of the scientific analysis.

Sincerely,

April Wakeman
Director of Programs

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